

17-14785-mdc Filed 08/05/21 Entered 08/05/21 17:47:23 Desc Main f 8

Fill in this information to identify the case:

Debtor 1 CARMEL NOEL

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of Pennsylvania

Case number 17-14785-mdc

Form 4100R

Response to Notice of Final Cure Payment

12/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: U.S. Bank National Association, as Trustee, successor in interest to Bank of America National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for LEHMAN XS TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-11 **Court claim no. (if known):** 3

Last 4 digits of any number you use to identify the debtor's account: 4606

Property address: 2759 Tolbut St
Number Street
Philadelphia, PA 19152
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: _____
MM/DD/YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 2,905.53
- b. Total fees, charges, expenses, escrow, and costs outstanding: Please see PPFN filed 05/04/2018. +(b) \$ 1,400.00
- c. **Total.** Add lines a and b. (c) \$ 4,305.53

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

07/01/2021
MM/DD/YYYY

Debtor1 CARMEL NOEL
First Middle Last

Case number (if known) 17-14785-mdc

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/Mario Hanyon Date 08/05/2021
Signature

Print Mario Hanyon Title Attorney
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 302 Fellowship Road, Ste 130
Number Street

Mount Laurel, NJ 08054
City State ZIP Code

Contact phone 844-856-6646 x4560 Email pabkr@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:

CARMEL NOEL

Case No. 17-14785-mdc

Chapter 13

U.S. Bank National Association, as Trustee,
successor in interest to Bank of America National
Association, as Trustee, successor by merger to
LaSalle Bank National Association, as Trustee for
LEHMAN XS TRUST MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2006-11,

Movant

vs.

CARMEL NOEL,

Debtor

and

William C. Miller, Trustee

Respondent

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response To Notice Of Final Cure Payment has been electronically served or mailed, postage prepaid on August 5, 2021 to the following:

Service by First-Class mail:
CARMEL NOEL
2759 TOLBUT ST
PHILADELPHIA, PA 19152

Service by Electronic means:

BRAD J. SADEK, Debtor's Attorney
1315 WALNUT ST
STE 502
PHILADELPHIA, PA 19107

William C. Miller, Bankruptcy Trustee
Chapter 13 Trustee
P.O. Box 40837
Philadelphia, PA 19107

United States Trustee, US Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

/s/ Mario Hanyon

Mario Hanyon
(Bar No. 203993)
Attorney for Creditor
BROCK & SCOTT, PLLC
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
Telephone: 844-856-6646 x4560
Facsimile: 704-369-0760
E-Mail: pabkr@brockandscott.com

Due Date	Due Amt	Date Received	Received Amt
8/1/2017	1521	10/4/2017	1,521.00
9/1/2017	1521	10/4/2017	1,521.00
10/1/2017	1521	11/15/2017	1,521.00
11/1/2017	1521	12/13/2017	1,521.00
12/1/2017	1521	1/10/2018	1,521.00
1/1/2018	1518.19	2/12/2018	1,521.00
2/1/2018	1518.19	3/16/2018	1,521.00
3/1/2018	1518.19	4/17/2018	1,521.00
4/1/2018	1518.19	5/23/2018	1,521.00
5/1/2018	1518.19	6/13/2018	1,521.00
6/1/2018	1518.19	7/13/2018	1,521.00
7/1/2018	1518.19	8/14/2018	1,521.00
8/1/2018	1518.19	9/17/2018	2.81
9/1/2018	1518.19	9/17/2018	1,518.19
10/1/2018	1518.19	10/17/2018	1,521.00
11/1/2018	1518.19	12/13/2018	1,521.00
12/1/2018	1520.78	1/14/2019	1,521.00
1/1/2019	1520.78	2/14/2019	1,521.00
2/1/2019	1520.78	3/12/2019	1,521.00
3/1/2019	1520.78	4/9/2019	1,521.00
4/1/2019	1520.78	5/13/2019	1,521.00
5/1/2019	1520.78	7/22/2019	1521
6/1/2019	1520.78	8/5/2019	1521
7/1/2019	1520.78	8/21/2019	1521
8/1/2019	1520.78	9/19/2019	1521
9/1/2019	1520.78	10/21/2019	1521
10/1/2019	1520.78	11/15/2019	1521
11/1/2019	1520.78	12/17/2019	1521
12/1/2019	1512.83	1/2/2020	1512.83
1/1/2020	1512.83	2/14/2020	1521
2/1/2020	1512.83	3/13/2020	1521
3/1/2020	1512.83	4/8/2020	1521
4/1/2020	1512.83	5/6/2020	1521
5/1/2020	1512.83	6/3/2020	1521
6/1/2020	1512.83	7/7/2020	1521
7/1/2020	1512.83	8/5/2020	1521
8/1/2020	1512.83	9/10/2020	1521
9/1/2020	1512.83	10/7/2020	1521
10/1/2020	1512.83	11/6/2020	1521
11/1/2020	1512.83	12/14/2020	1521
12/1/2020	1519.55	1/13/2021	1521
1/1/2021	1519.55	2/3/2021	1521
2/1/2021	1519.55	3/10/2021	1521
3/1/2021	1519.55	4/7/2021	1521
4/1/2021	1519.55	5/11/2021	1521
5/1/2021	1519.55	6/9/2021	1521
6/1/2021	1519.55	7/16/2021	1521
7/1/2021	Due	8/14/2021	1521

Due Date	Due Amt
7/1/2021	1519.55
8/1/2021	1519.55

Total	71345.26		71,478.83
Suspense		133.57	

Fill in this information to identify the case:

Debtor 1 CARMEL NOEL
 Debtor 2 _____
 (Spouse, if filing) _____
 United States Bankruptcy Court for the: EASTERN District of PA
 Case Number 17-14785 MDC (State)

Official Form 410S2

Amended Notice of Postpetition Mortgage Fees, Expenses, and Charges

12/16

If the debtor's plan provides for payment of postpetition contractual installments on your claim secured by a security interest in the debtor's principal residence, you must use this form to give notice of any fees, expenses, and charges incurred after the bankruptcy filing that you assert are recoverable against the debtor or against the debtor's principal residence.

File this form as a supplement to your proof of claim. See Bankruptcy Rule 3002.1.

Name of creditor: U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN XS TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-11

Court claim no. (if known): 3

Last 4 digits of any number you use to identify the debtor's account:

4606

Does this notice supplement a prior notice of postpetition fees, expenses, and charges?

☒ No.

☐ Yes. Date of last notice: _____

Part 1: Itemize Postpetition Fees, Expenses, and Charges

Itemize the fees, expenses, and charges incurred on the debtor's mortgage account after the petition was filed. Do not include any escrow account disbursements or any amounts previously itemized in a notice filed in this case. If the court has previously approved an amount, indicate that approval in parentheses after the date the amount was incurred.

Description	Dates Incurred	Amount
1. Late Charges	_____	(1) \$ _____
2. Non-sufficient funds (NSF) fees	_____	(2) \$ _____
3. Attorney fees	11/14/2017 – Preparation/Filing of Objection to Plan 12/13/2017 – Plan Review	\$500.00 (3) \$150.00
4. Filing fees and court costs	_____	(4) \$ _____
5. Bankruptcy/Proof of claim fees	11/14/2017 - Preparation/Filing of Proof of Claim	(5) \$750.00
6. Appraisal/Broker's price opinion fees	_____	(6) \$ _____
7. Property inspection fees	_____	(7) \$ _____
8. Tax advances (non-escrow)	_____	(8) \$ _____
9. Insurance advances (non-escrow)	_____	(9) \$ _____
10. Property preservation expenses. Specify: _____	_____	(10) \$ _____
11. Other. Specify: _____	_____	(11) \$ _____
12. Other. Specify: _____	_____	(12) \$ _____
13. Other. Specify: _____	_____	(13) \$ _____

14. Other. Specify: _____

(14) \$ _____

The debtor or trustee may challenge whether the fees, expenses, and charges you listed are required to be paid.
See 11 U.S.C. § 1322(b)(5) and Bankruptcy Rule 3002.1.

Part 2: Sign Here

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.

Check the appropriate box.

☐ I am the creditor.

☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

X /s/ Jerome Blank, Esquire
Signature

Date May 4, 2018

Print: Jerome Blank, Esq., Id. No.49736
First Name Middle Name Last Name

Title _____

Company Phelan Hallinan Diamond & Jones, LLP

Address 1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

Contact Phone 215-563-7000

Email jerome.blank@phelanhallinan.com